

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

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MDL No. 3:16-md-02738-MAS-RLS

This Document Relates To All Cases

**NOTICE OF MOTION TO EXCLUDE THE OPINIONS OF DRS. DAVID  
KESSLER, LAURA PLUNKETT, WILLIAM SAGE, AND GEORGE  
NEWMAN**

**PLEASE TAKE NOTICE** that on a date to be determined by the Court, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC (“Defendants”)’s Motion to Exclude the Opinions of Drs. David Kessler, Laura Plunkett, William Sage, and George Newman before this Court. Defendants will ask for entry of an order that excludes Drs. Kessler’s, Plunkett’s, Sage’s, and Newman’s opinions in full.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Jessica Davidson, Esq., together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted

herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: July 23, 2024

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

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